GW CUMBERLAND OP CO

Diversity and Inclusion Plan Update

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EXECUTIVE SUMMARY

Our mission is to maintain an open and welcoming atmosphere where employees, guests, business partners and the community at large feel comfortable and respected. The Diversity and Inclusion plan's focus is to connect our business to real opportunities through outreach and partnership.

- We value diversity in the workplace. The best ideas and efforts come not from one individual, but when drawn from many different perspectives and viewpoints. We strive to capitalize on the varied experiences, ideas and knowledge that each employee brings to the business. We reach out to recruit directly from universities and colleges in the region and attend job fairs to find the best talent. We also contact state and local job placement organizations and services. We will target advertising for job vacancies in local residents groups. We function as a team. We are the Best of the Best.

- We value diversity in our business partnerships. Our goal is to ensure that there is an equal opportunity for all vendor and contractor partners to participate in our business and share in our success. We have joined the Eastern Minority Supplier Development Council. EMSDC is an organization that assists MBE and WBE owned businesses in the vendor certification process. Our outreach extends to :

    1. Shippensburg area Chamber of Commerce
    2. The Small Business Development Center
    3. The Downtown Organization Investing Together
    4. The Women's Business Enterprise Council
    5. The Shippensburg Area Development Corporation
    6. The Women's Business Enterprise Corporation
    7. Cumberland are Chambers of Commerce

  We will meet with these local (LBE) organizations that provide vendor and contractor outreach opportunities. Since January 2008, our organization has conducted 1050 vendor meetings with MBE, WBE and LBE businesses that has led to relationships for many of these companies and great partnerships for the business community.

From 2009-2017, Our Company has awarded significant business to MBE, WBE and LBE construction contractors.

- GW Cumberland OP CO recognizes and values the diversity of our customers. We understand that customers can choose from among many entertainment destinations in Pennsylvania, and we will be honored for them to choose our casino. We pledge that the quality of service and attention they receive while visiting us will serve as proof of our appreciation for their patronage.

- We welcome the opportunity to be an active member of the community. The success and well-being of our business directly impacts the success and well-being of our community. We support local and regional charitable organizations in four areas:
    - Community
    - Health
    - Education
    - Senior Organizations

  We are proud to work in partnership with civic and charitable organizations and GW Cumberland Operating Company is a generous contributor to various local, national and international organizations.

GW Cumberland OP CO is an advocate for a strong and vital business community. We believe that strong partnerships work!

DIVERSITY DEFINITIONS

Diversity refers to the variety of backgrounds and characteristics found in society today; thus it embraces all aspects of human similarities and differences. Diversity refers specifically to historically under-represented groups and differences with respect to age, culture, race, ethnicity, religion, color, disability, national origin, ancestry, sexual orientation and veteran's status. Business definitions of diversity are as follows:

DIS Disabled Business Enterprise

DIS is business that is at least 51% owned and controlled by a disabled individual.

DVET Disabled Veterans Business Enterprise

DVET are businesses that are at least 51% owned and controlled by one or more disabled veterans.

MBE Minority Owned Business Enterprise

MBE businesses are at least 51% owned and controlled by individuals belonging to certain ethnic minority groups. Ethnic minorities are United States citizens who are Asian, African American, Hispanic or Native American.

M/WBE Minority Women Owned Business Enterprise

M/WBE businesses are at least 51% owned and controlled by citizens belonging to certain minority groups and/or a person of female gender.

VET Veteran Owned Business Enterprise

VET businesses are at least 51% owned by individuals who are veterans of the U.S. Armed Forces.

WBE Women Owned Business Enterprise

WBE businesses are at least 51% owned and controlled by a person who is female in gender.

STATEMENT OF GOALS

1. To establish a diverse workforce by ensuring consistency, fairness and inclusion in the recruitment, selection and the career development process.

2. To promote diversity by ensuring equal opportunity in the procurement of contractors, sub-contractors, assignees, lessees, agents, vendors and suppliers.

3. To create an open and welcoming atmosphere at all of our properties where employees, guests and vendors feel comfortable and welcome.

4. To actively seek out minority and women and other historically under-represented groups to provide opportunities for them to bid on providing services and/or supplies.

5. To be a strong financial supporter of a diverse number of worthwhile community charities and non-profit organizations through our community giving program.

DIVERSITY IN THE WORKPLACE

The four primary areas of diversity effectiveness are awareness, fairness, inclusion and leverage. The GW Cumberland Op Co seeks to provide leadership in all of these areas of diversity and to encourage and support senior executives as they promote these goals in their areas of responsibility.

We encourage them to examine racial, ethnic, cultural, gender and age issues in both the local community and the workforce; to understand the importance and appreciation for people; examine stereotypes and prejudices and how they impact behavior and how to interact more effectively with people from all walks of life. We will also include an examination of special needs, veterans and all historically under-represented groups.

The Human Resources and Legal departments will provide appropriate support and assistance, but GW Cumberland Op Co looks to all of its senior executives to incorporate diversity into their areas of responsibility within our workforce. Absolute impartiality is required when recruiting, selecting and orienting new hires. The same is expected when considering candidates for pay reviews, further training and promotions.

Recruitment

G W Cumberland Op Co through its affiliated employer companies, is an Equal Opportunity Employer.

Our policy reflects our commitment to recruiting, retaining, and developing a workforce that represents our local community and customer base. It promotes a well-rounded workplace where differences are respected and valued. Our goal is to build a qualified, culturally diverse team that fosters creativity and helps every Team Member reach their full potential.

In addition to GW Cumberland Op Co Company traditional ways of seeking new candidates, we will undertake the following outreach strategies:

1. Working with Shippensburg University and area business groups and organizations representing underrepresented citizens in our community.

2. Developing close relationships with federal, state and local agencies and minority hiring programs to increase opportunities for minority applicants.

3. Regular monitoring by Human Resources to ensure that our diversity targets and benchmarks reflect our community. This includes tracking applicant flow by inserting a survey in the application process asking applicants to voluntarily indicate race/ethnic origin.

4. Cultivating historically black colleges and universities to make them aware of the many career opportunities in gaming.

5. Attending job fairs in Central Pennsylvania, with an emphasis on those that target minorities and women.

Selection and Orientation

All GW Cumberland Op Co employees involved in recruitment and selection will receive training on lawful employment practices. We welcome all qualified applicants and select candidates based on their suitability for each position and our organization. A diversity assistant will lead diversity and inclusion orientation workshops. We will distribute recruitment materials in a broad range of communities to attract a diverse applicant pool, including areas with many job seekers.

We will ensure that all employment literature is clear and understandable including:

1. Website information available online at parxcasino.com
2. Any collateral including written tests that may be used.
3. Post hire paperwork
    - Employee Handbooks
    - 401 K and other Employee Benefit Information
    - Union Literature
    - Medical Health Information
4. Newsletters and company- wide communications

Training

GW Cumberland Op Co will conduct ongoing training for department heads and senior staff on the different training methods appropriate to reach people with diverse or non-traditional learning styles. We will ensure that training curriculum materials are designed to be effective for a diverse workforce that is inclusive and engaged. Multi-cultural appreciation is paramount to connecting with a diverse workforce. We will continue to encourage our Team Members to embrace diversity; this begins with our formal orientation program and training when a new Team Member is hired.

GW Cumberland Op Co also encourages our Team Members, regardless of background, to pursue their goals through higher education by providing tuition assistance and by partnering with local colleges. Our program is a company asset where we can encourage personal and professional growth.

Employee Relations

When possible, G W Cumberland OP Co. will recognize and promote special dates, events and holidays such as:

- African American History Month
- Women's History Month
- Asian American Heritage Month
- Gay and Lesbian Pride Month
- Hispanic Heritage Month
- American Indian Heritage Month
- Veterans Day

It is of vital importance to our organization and the community that we foster positive relationships among our Team Members and encourage them to share their experiences with management so the company can grow. Creativity and experience are important to us and we ask that our Team Members share their diverse backgrounds so that we may assist them in better understanding one another, which also helps with our guests. We encourage our team members to use their vast knowledge and share their ideas to strengthen our sense of community within our organization.

We will also publicize such events in the company newsletter and onsite message boards and also on the company's web pages and further support them with the following tools or techniques:

1. Coordinate the special celebrations with the Food & Beverage department so appropriate celebratory meals will be available.
2. Host diversity focused events where employees can bring food from their cultures to share with others.
3. Designate an area where employees can display artifacts or information about their cultures.
4. Conduct Diversity quizzes with prizes and company newsletter.

Career Development

Our efforts in career development will include:

- Regularly perform a survey of all pay increases/promotions to measure the success of the diversity initiative.

- Track and review the pay increases/promotions within each department.

- Hold managers accountable, support and encourage them while they implement our diversity plan in their respective departments.

- Create development plans where appropriate and encourage a diverse pool of applicants to be presented for promotional opportunities.

DIVERSITY AND OUR GUESTS

Our goal is to market and advertise our company so that we create an inviting atmosphere at our properties where individuals of many diverse backgrounds feel comfortable.

1. Use our relationships in multicultural organizations to support these organizations and promote diversity.
2. Food and Beverage initiatives.
3. Celebration of holidays and special events.
4. Research of the trends and expectations in emerging multicultural markets.

DIVERSITY IN COMMUNITY GIVING

GW Cumberland Op Co is proud of its outstanding record in support of charitable organizations and is effective outreach activities that create positive community impact.

1. Encourage strong and positive citizenship in the community.
2. Encourage employees to participate in local community organizations.
3. Sponsor “How to apply for a job” workshops at local community colleges in the area.
4. Collaborate with community organizations to serve as mentors to any programs that support our diversity initiatives.
5. Provide scholarships for local students attending colleges and universities.
6. Supply community food banks with excess food from company inventory.
7. Encourage charitable payroll deductions to reflect our diverse employee population that allows them to support causes important to them!

GW Cumberland Op Co also strives to bring support to worthwhile non-profit organizations in our community that is effective in the areas of healthcare, seniors and education. Since commencement of gaming operations in 2006 Parx Casino in Bensalem has made significant philanthropic contributions to many notable beneficiaries including:

- Shippensburg area EMS
- Shippensburg Foundation
- West End Fire and Rescue
- Shippensburg Area Chamber
- Vigilant HOSE company
- Special Olympics
- Health Fair for Seniors
- American Red Cross
- NAACP

- Habitat for Humanity
- YWCA
- Bensalem EMS
- Minority Supplier Development Council
- Senior Centers
- Fallen Firefighters
- High School Scholarships
- Ronald McDonald House
- Veterans Parade
- Pumpkin Festival
- VFW post 6168
- Philadelphia Firefighters Local 22
- St. Mary's Hospital
- Latino Leadership Alliance
- African American Chamber of Commerce
- Hispanic Chamber of Commerce
- Asian American Chamber of Commerce
- Bensalem Seniors Center
- Council on Compulsive Gambling
- Fall Festival
- Pride Day
- St. Patrick's Day Parade
- Burrough of Shippensburg
- Lower Bucks County Chamber of Commerce membership
- Shippensburg Chamber of Commerce membership
- Veterans Outreach programs
- Disabled through Woods Resources Community Outreach

DIVERSITY IN BUSINESS PARTNERSHIPS

It is our intention to create an environment where there is equality of opportunity in all of our business partnerships. We will work with a diverse group of contractors, suppliers and other vendors, certified minority owned, women owned, disabled and small business enterprises to provide our company with goods and services. A database will be developed to match historically under-represented suppliers to buying opportunities within our company.

We will encourage all of our partners to support diversity efforts through second tier supplier programs.

In turn the company will mentor disadvantaged businesses to help them develop.

Our executives are committed to attending trade shows and trade fairs as a way of meeting new potential partners. A web site will be created allowing potential vendors to be included in the vendor database and receive information about procurement of goods and services.

Key diversity activities include:

- Review and improve our supplier diversity website for MBE, WBE and DIS online registration.

- Participate in construction meetings relating to the casino expansion to set the expectation for inclusion of minority and women owned businesses.

- Attend diversity focused trade shows, conferences and conventions such as the Minority Supplier Development Council, NAACP, Hispanic Chamber of Commerce, African American Chamber of Commerce, and Asian American Chamber of Commerce.

- Conduct regular vendor meetings with our buyers to discuss enriching business partnerships through inclusion.

- Mentor MBE, WBE businesses to include them in our supplier pipeline.

- Discuss and recognize barriers in an effort to remove them and to provide solutions.

DIVERSITY AND INCLUSION COMMITTEE

To ensure that our goals are reached we will establish a Diversity and Inclusion Committee, which will be chaired by a senior executive and includes representation from a broad spectrum of our organization. The Diversity Director is a key member of the committee.

The goal of the committee is to address three main diversity targets:

1. The Workplace – Recruitment, selection, training, pay, benefits, upward mobility and work environment.
2. Guest Relations – Marketing, advertising and promotions.
3. Business Partnerships – Local community, minority, women, disabled and Veteran owned business.

The Diversity and Inclusion Committee will seek to create a positive atmosphere of awareness, fairness, inclusion and leverage.

DIVERSITY AND COMMUNITY DEVELOPMENT DIRECTOR

The Parx Casino Director of Diversity and Community Development reports to the Chief Executive Officer and is responsible for the implementation, monitoring and enforcement of the Diversity and Inclusion Plan. He will oversee all diversity and community development activities by GW Cumberland Co. These responsibilities include: recruitment, equal opportunity awareness training, workforce statistical analysis, grievance counseling and fact finding, career advancement counseling, assessment and adaptation of all personnel and compensation policies and procedures for conformity with agreed policies approved by any federal or state equal employment and business opportunity laws, monitoring and coordinating contracting and purchasing and construction activities and developing and maintaining involvement of the company in the community in support of equal employment and business opportunity.

The Director of Diversity and Community Development will continually communicate with the General Manager ,Human Resources, Purchasing , Facilities and Construction departments to ensure that the objectives of the policy are being met. These departments will be required to submit reports of contracts awarded and contractor advertising for all levels of the workforce to demonstrate efforts made to comply. In addition, the Diversity and Community Development Director works closely with the Vice President of Human Resources to review employment practices to determine that all policies and procedures apply equally to all employees and all policies comply with our diversity initiatives.

The Director of Diversity and Community Development also works with local stakeholders to keep them informed of the company's efforts in these areas and their impact on the community. The Director also serves as a member of the Responsible Gaming Committee focusing on underage and problem gaming prevention.

The Director of Diversity and Community Development will work closely with the American Gaming Association task force. The AGA is committed to promoting diversity in the commercial casino industry and accomplishes this commitment through a number of initiatives that focus on hiring and procurement. The goal is to maximize participation on the human resource, purchasing and contracting subcommittees of AGA. The Diversity and Community Development will coordinate the company's participation in expos

and fairs designed to give small suppliers and vendors the chance to showcase their products directly with purchasing decision makers.

The Director of Diversity and Community Development will direct the company's philanthropic donations to Shippensburg's local, regional and nonprofit organizations and charities.

PLAN MEASUREMENT AND EVALUATION

Evaluation is continuous with quarterly reports to the Pennsylvania Gaming Control Board on the key areas of plan performance. Periodic site visits and audits from the Pennsylvania Gaming Control Board's Chief Diversity Officer are an important part of external evaluation.

Internally, the Diversity and Inclusion Committee will provide ongoing assistance with evaluation and measurement. Other activities of the committee include:

- Providing the CEO and the senior executives committee with periodic audit reports of their findings, including identifying accomplishments as well as any areas for improvement.
- Providing the Gaming Board with a report of our diversity results on quarterly and annual bases
- Recommending diversity and Inclusion programs and community projects.
- Advising the company's management team with respect to the foregoing.
- Documenting the committee's activities and progress and updating the senior executives on that progress.